



FISHERIES ASSOCIATION OF NEWFOUNDLAND AND LABRADOR LIMITED

90 O'Leary Avenue • P.O. Box 8900 • St. John's, NL • A1B 3R9 • Tel: (709) 726-7223 • Fax: (709) 754-3339

March 31, 2003

Mr. Robert Lake
Director, Office of Regulations and Policy
Center for Food Safety and Applied Nutrition
Dockets Management Branch
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD, USA 20852

Dear Mr Lake:

The Fisheries Association of Newfoundland and Labrador is a seafood processing trade group representing the majority of seafood exporters in the Province of Newfoundland and Labrador. Our members are concerned about the potential impacts of the regulations being considered pursuant to implementation of the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002*. Our concerns relate to the restrictive time frames for prior notice of arrival times at border crossing points and the limitations as to who must provide notification. We have had, through our member firms, input into the position of the Canadian Food Inspection Agency which will be communicated to you prior to the April 4th deadline for comments. We have also reviewed the position put forward on this matter by the Fisheries Council of Canada in a letter to you dated March 6th, 2003. Rather than reiterate the points contained in these correspondence, we state for the record our full support of these positions and request that you give every consideration to implementing the suggested amendments.

The seafood exporters in Newfoundland and Labrador have enjoyed longstanding business relationships with U.S. seafood importers and processors. Our shipping schedules and time frames are already challenged by transportation difficulties, particularly our requirement to ship product by boat between the Island of Newfoundland and the Province of Nova Scotia. In this context, flexibility in notification times and amendments to notification times are needed. We are mindful of the importance of achieving safety in your food supply and our firms are committed to working with you and our American customers and partners in providing unparalleled assurance of high quality and safe seafood.

Your consideration of Canadian representations on this issue is appreciated.

Sincerely,

Alastair O'Rielly
President

AOR/amt